

**PSJ4 SOL Opp Exh 20**

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1           IN THE UNITED STATES DISTRICT COURT  
2           NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION

5  
6           IN RE: NATIONAL PRESCRIPTION      MDL No. 2804  
7           OPIATE LITIGATION

8    Case No. 17-md-2804  
9    Judge Dan Aaron  
10   This document relates to:                                  Polster

11    The County of Summit, Ohio, et al.  
12    v. Purdue Pharma L.P., et al.  
13    Case No. 17-OP-45004

14    The County of Cuyahoga v. Purdue  
15    Pharma L.P., et al.  
16    Case No. 18-OP-45090

17    City of Cleveland, Ohio v. Purdue  
18    Pharma L.P., et al  
19    Case No. 18-OP-45132

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21    Videotaped deposition of  
22    APRIL R. VINCE

23    December 13, 2018  
24    9:07 a.m.

25    Taken at:  
26    Climaco, Wilcox, Peca & Garofoli Co., L.P.A.  
27    55 Public Square, Suite 1950  
28    Cleveland, Ohio

29    Renee L. Pellegrino, RPR, CLR

1 issue became a critical issue within Cuyahoga  
2 County?

3 MS. WILSON: Objection to form.

4 A. As a part of my job, it was my job  
5 to review data from the medical examiner, but  
6 not to understand when the epidemic started.

7 Q. Do you have any understanding just  
8 personally of when it started?

9 A. Not really.

10 Q. Was it five years ago?

11 A. Again, if I was to look at the  
12 medical examiner's data and it reflected  
13 anything as far as overdose dates, 2015, '16  
14 there was a large spike in overdose deaths.  
15 That's the most -- that's the thing that -- the  
16 only thing I have that's concrete.

17 Q. So you would tie the epidemic to the  
18 number of overdose deaths?

19 A. At least for Cuyahoga County, yes.

20 Q. Okay. Not the formation of the task  
21 force or anything like that?

22 A. Again, that was before I worked with  
23 it at all, so I can't speak to that.

24 Q. How about just as a member of the  
25 community, though? Did you have any